

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**NOTICE OF FILING OF DEFENDANTS' MOTION TO SEAL**

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5, Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel and in accordance with the Stipulated Protective Order entered in this matter on August 18, 2016 (Dkt. 45) hereby gives public notice that a Motion to Seal was filed on January 11, 2021 to respectfully move this Court for entry of an Order directing that (1) documents attached as exhibits to Defendants' memorandum supporting their Motion *in Limine* to Exclude Evidence of the Ethnicity of Individuals at the Park Allegedly Affected by the Policy (Dkt. 323); and (2) portions of documents attached as exhibits to Defendants' memorandum supporting their Motion *in Limine* to Exclude Evidence of Lease Materials and Purported "Eviction" Correspondence (Dkt. 329) filed on January 11, 2021 be sealed. Defendants' Motion to Seal respectfully moves the Court to seal the following:

- Exhibits 1-7 to Defendants' memorandum supporting their Motion *in Limine* to Exclude Evidence of the Ethnicity of Individuals at the Park Allegedly Affected by the Policy (Dkt. 323); and

- The redacted portions of Exhibits 2-5 to Defendants' Memorandum Supporting their Motion *in Limine* to Exclude Evidence of Lease Materials and Purported "Eviction" Correspondence (Dkt. 329).

Defendants' Motion to Seal was filed on January 11, 2021 and memoranda in support of or in opposition to the motion must be filed within seven (7) days after the filing of Defendants' Motion to Seal, and all or part of such memoranda may be designated as confidential. Further, any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the Defendants' Motion to Seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, WAPLES PROJECT LIMITED  
PARTNERSHIP AND  
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

---

Grayson P. Hanes (VSB No. 06614)  
Michael S. Dingman (VSB No. 30031)  
Justin deBettencourt (VSB No. 83806)

REED SMITH LLP  
7900 Tysons One Place  
Suite 500  
McLean, Virginia 22102  
(703) 641-4200 (Telephone)  
(703) 641-4340 (Facsimile)  
[ghanes@reedsmith.com](mailto:ghanes@reedsmith.com)  
[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)  
[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of January, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Grayson P. Hanes (VSB No. 06614)  
Michael S. Dingman (VSB No. 30031)  
Justin deBettencourt (VSB No. 83806)

REED SMITH LLP

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

[ghanes@reedsmith.com](mailto:ghanes@reedsmith.com)

[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)

[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)

*Counsel for Defendants*